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13 Attorneys for Defendants,
JOHN EARL REDFERN, J. REDFERN, INC.,
14 dba GOLDEN STATE LANDSCAPING; JLS
PARTNERS, INC., dba GSL CONSTRUCTION,
15 EMPIRE LANDSCAPE CONSTRUCTION

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 MARCOS VARGAS, ROMUALDO
20 ALTAMIRANO, PEDRO RAMOS,
BULMARO BAZAN, MARCOS
21 MANDUJANO, JOSE: SOLIS, LUIS
PENA, BENITO CHAIREZ, FIGUEROA,
22 FREDY ROCHA, SALVADOR FLORES,
ISMAEL CORONA, EPIGMENIO
23 LOPEZ, JUAN CORONA, ENRIQUE
TAMAYO, FRANCISCO SALGADO,
24 SILVERIO TORRES, MARTIN RAMOS
RAMIREZ, ANGEL SANCHEZ, ERON
25 LOPEZ, EDUARDO VARGAS, JORGE
SOTO, RIGOBERTO SANCHEZ:, JULIO
26 LOPEZ, JOSE J. GARCIA, PEDRO
SIERRA, DAMACIO SANCHEZ, JUAN
27 GUERRA, JAIME MARTINEZ JR.,
ROBERT MONTOYA, MATEO
28 GUZMAN, LAZARO MAYA, JOSE

Case No. C-12-04052-CRB

**JOINT STIPULATION AND ORDER
REGARDING RESPONSIVE PLEADING
TO THE COMPLAINT PURSUANT TO
LOCAL RULE 6-1**

JOINT STIP. AND [PROPOSED] ORDER
REGARDING RESPONSE TO COMPLAINT

ESTRADA, ANICETO ALMANZA
SANCHEZ, EMILIO VARGAS, JOSE
ANTONIO ALVAREZ, ANTONIO
RODRIGUEZ, JOSEPH RENEE
RODRIGUEZ, MAURICIO SANCHEZ,
MAURICIO SANCHEZ ARZATE,
MANUEL RENTERIA, MIGUEL
SUCHIL MENDOZA, and VICENTE
MARTINEZ, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

JOHN EARL REDFERN, an individual;
J. REDFERN, INC., (dba "GOLDEN
STATE LANDSCAPING"), a California
Corporation; JLS PARTNERS, INC.,
(dba "GSL CONSTRUCTION"), a
California Corporation; and EMPIRE
LANDSCAPE CONSTRUCTION, a
California Corporation,

Defendants.

Plaintiffs Marcos Vargas, Romualdo Altamirano, Pedro Ramos, Bulmaro Bazan, Marcos
Mandujano, Jose Solis, Luis Pena, Benito Chairez, Figueroa, Fredy Rocha, Salvador Flores, Ismael
Corona, Epigmenio Lopez, Juan Corona, Enrique Tamayo, Francisco Salgado, Silverio Torres,
Martin Ramos Ramirez, Angel Sanchez, Eron Lopez, Eduardo Vargas, Jorge Soto, Rigoberto
Sanchez, Julio Lopez, Jose J. Garcia, Pedro Sierra, Damacio Sanchez, Juan Guerra, Jaime Martinez
Jr., Robert Montoya, Mateo Guzman, Lazaro Maya, Jose Estrada, Aniceto Almanza Sanchez, Emilio
Vargas, Jose Antonio Alvarez, Antonio Rodriguez, Joseph Renee Rodriguez, Mauricio Sanchez,
Mauricio Sanchez Arzate, Manuel Renteria, Miguel Suchil Mendoza, and Vicente Martinez,
(collectively "Plaintiffs") and Defendants John Earl Redfern, J. Redfern, Inc. (dba Golden State
Landscaping), JLS Partners, Inc. (dba GSL Construction), and Empire Landscape Construction
(collectively "Defendants") agree and stipulate, through their respective counsel, to the following
extension:

1 1. The parties are currently finalizing a settlement, and thus, they would like to direct
2 their resources and time to settlement discussions.

3 2. The settlement involves over forty individual plaintiffs and a proposed class
4 settlement of a related state action, which is why it is taking quite a bit of time to finalize.

5 3. The state court has set September 26, 2013 as the hearing date for the motion for
6 approval of the state court class settlement.

7 4. The settlement of the Plaintiffs' claims in this matter will be contingent upon court
8 approval of the class settlement.

9 5. The parties would like additional time to finalize the settlement agreements and have
10 agreed to continue the deadline for Defendants' responsive pleading to Plaintiff's complaint from
11 July 16, 2013 until October 16, 2013.

12 6. The parties also request that the initial Case Management Conference, which is
13 scheduled for August 9, 2013, be postponed to November 8, 2013.

14 THEREFORE, the parties hereby stipulate and request that this Court order the following:

15 1. The deadline for Defendants to file their responsive pleading to Plaintiffs' complaint
16 is set for October 16, 2013.

17 2. The Case Management Conference be scheduled for November 8, 2013 or to a date
18 convenient for the Court.

Dated: July 16, 2013

/s/ Marco A. Palau

MARCO A. PALAU

LAW OFFICES OF MALLISON &
MARTINEZ

Attorneys for Plaintiffs

MARCOS VARGAS, ROMUALDO
ALTAMIRANO, PEDRO RAMOS,
BULMARO BAZAN, MARCOS
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ROCHA, SALVADOR FLORES, ISMAEL
CORONA, EPIGMENIO LOPEZ, JUAN
CORONA, ENRIQUE TAMAYO,
FRANCISCO SALGADO, SILVERIO
TORRES, MARTIN RAMOS RAMIREZ,
ANGEL SANCHEZ, ERON LOPEZ,
EDUARDO VARGAS, JORGE SOTO,
RIGOBERTO SANCHEZ:, JULIO LOPEZ,
JOSE J. GARCIA, PEDRO SIERRA,
DAMACIO SANCHEZ, JUAN GUERRA,
JAIME MARTINEZ JR., ROBERT
MONTOKA, MATEO GUZMAN, LAZARO
MAYA, JOSE ESTRADA, ANICETO
ALMANZA SANCHEZ, EMILIO VARGAS,
JOSE ANTONIO ALVAREZ, ANTONIO
RODRIGUEZ, JOSEPH RENEE
RODRIGUEZ, MAURICIO SANCHEZ,
MAURICIO SANCHEZ ARZATE, MANUEL
RENTERIA, MIGUEL SUCHIL MENDOZA,
and VICENTE MARTINEZ

Dated: July 16, 2013

/s/ Marlene S. Muraco

MARLENE S. MURACO

LITTLER MENDELSON

A Professional Corporation

Attorneys for Defendants

JOHN EARL REDFERN, J. REDFERN, INC.,
dba GOLDEN STATE LANDSCAPING; JLS
PARTNERS, INC., dba GSL
CONSTRUCTION, EMPIRE LANDSCAPE
CONSTRUCTION

1 IT IS SO ORDERED:

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4 Dated: July 18, 2013
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